

**IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Case No. 2:06-cr-0223-MEF
)	
KAREN KILGO ROBINSON,)	
)	
Defendant.)	

**MOTION TO RECONSIDER ELECTRONIC MONITORING
AND REQUEST FOR JAIL VISITATION**

COMES NOW Defendant Karen Kilgo Robinson, by and through the undersigned appointed counsel, and respectfully requests, this Honorable Court to reconsider her currently imposed electronic monitoring and to allow her jail visitation with her husband, Adam Lamar Robinson at the Montgomery City Jail.

As grounds in support thereof, the following is stated:

1. The defendant is charged (along with her husband, Adam Lamar Robinson) with violations of Title 26, U.S.C. § 5841, 5861(d), and 5871.
2. The defendant has been compliant with her electronic monitoring since on or about September 22, 2006.
3. As a condition of her pretrial release, the defendant is required to seek employment.
4. The defendant has been unable to wear dress shoes or boots with the electronic monitor.
5. The defendant is seeking office-type employment where dress shoes,

not tennis shoes, are required. The defendant additionally complains of leg and ankle swelling that causes discomfort with the monitor.

6. The defendant's husband is currently incarcerated at the Montgomery City Jail. Defendant has been denied the opportunity to visit her husband, as it was not a condition of her pretrial release.

WHEREFORE, the defendant moves that the conditions of her pretrial release be modified to: 1) allow her visitation with her husband at the Montgomery City Jail; and 2) that she no longer be subjected to electronic monitoring.

Respectfully submitted this 31st day of October, 2006.

s/ Richard K. Keith
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CERTIFICATE OF SERVICE

I hereby certify that on October 31, 2006, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

Verne Speirs, AUSA
Post Office Box 197
Montgomery, AL 36101-0197

s/ Richard K. Keith
OF COUNSEL